## REMARKS

Claims 1-21 are pending.

Claims 1-21 are rejected.

Claims 1-21 are rejected under 35 U.S.C. 103(a).

## Claim Rejections – 35 U.S.C. § 103

Claims 1-2, 5, 7-8 and 11 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Applicant Admitted Prior Art (AAPA) in view of U.S. Patent No. 4,356,482 to Oguchi ("Oguchi") and further in view of U.S. Patent No. 6,289,411 to Okumura, et al. ("Okumura").

The Applicant Admitted Prior Art does not disclose any chip selection signal, as was discussed in the response to the previous office action. It would not be a mere duplication of effort, as some mechanism would be needed to identify which chip was currently active, which is not shown, taught nor suggested by the AAPA, as the AAPA is directed to a single chip system.

To expand that system to the currently claimed system is not a mere duplication of effort, as the sector addresses in the current system are arranged across the entire memory system in the currently claimed system. This is discussed on page 7 of the current specification.

Oguchi is directed to a system in which an image pattern control system uses a dynamic memory to read and rewrite the contents of a memory according to address data in an address register. The office action states, "Oguchi teaches a memory system with an address clock generator 26 comprising a decoder 26b that generates an address clock signal in response to an address count-up signal from counter 26a." However, this is not true.

In Figure 4, it does appear that the decoder 26b uses the output of the counter 26a. However, in the textual description of these blocks, it becomes clearer. In column 4, lines 11-16, Oguchi states, "The address clock generator 26 consists of a counter 26a of a 4-bit type, for example, which counts the output of the dot timing clock generator 28, a decoder 26b which divides the frequency of the output of the dot timing clock generator 28 by ten, for example, by implementing a parallel output of the counter 26a..." Therefore, the decoder 26b does not generate an address clock signal in response to an address count-up signal.

Finally, Okumura discloses a system in which a chip signal is used to select an active chip, but the sector addresses from each chip are the same. See Okumura, col. 9, lines 22-35. The sector addresses on each chip is the same, relying upon the chip selection signal to select a

sector from one chip to the next. This is not the same as a system, as claimed in claim 1, for example, where the sector addresses are 'arranged across the whole memory system.' As discussed in Applicant's specification, and only intended as an example, two 128-sector chips would have the sector addresses arranged from 0-255. What is disclosed in Okumura is a system in which both chips would be arranged from 0-127.

Therefore, none of the references, nor the combination of references, teaches, shows or suggests a system in which the sector addresses identified by a count-up address generator are across the whole memory system. Claims 1 and 7 have been amended similar to the language set forth above for claim 1, to more clearly set out the sector addresses of the memory system, and claim 19 has been amended to more clearly set out that the generation of the sector addresses is across the whole memory system.

Claims 3, 9, 13-15 and 17 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Applicant Admitted Prior Art (AAPA) in view of Oguchi and further in view of U.S. Okumura, and further in view of U.S. Patent No. 4,654,695 to Fling ("Fling").

The combination of AAPA, Oguchi and Okumura does not teach all of the limitations of claims 1 and 7, much less the further embodiments of claims 3 and 9. Fling does not cure this deficiency. It is therefore submitted that claims 3 and 9 are patentably distinguishable over the prior art and allowance of these claims is requested.

Further, claim 13 has been amended in a similar fashion as claims 1 and 7, requiring, "a memory cell array constructed of a plurality of sectors, wherein the sectors have addresses across the memory system..." As discussed above, this is not taught by the first combination of references and Fling does not cure that deficiency. Claims 14-15 and 17 depend from claim 13 and inherently contain all of the limitations of that base claim. It is therefore submitted that claims 13-15 and 17 are patentably distinguishable over the prior art and allowance of these claims is requested.

Claims 4, 10 and 16 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Applicant Admitted Prior Art (AAPA) in view of Oguchi and further in view of U.S. Okumura, and further in view of Fling, and further in view of U.S. Patent No. 6,904,400 to Peri, et al. ("Peri").

Claims 4, 10 and 16 depend respectively from claims 1, 7 and 13. As discussed above, the first combination of AAPA, Oguchi and Okumura does not teach all of the limitations of the

prior art and the additions of Fling and Peri do not cure this deficiency. Neither of the references added to the combination teach sector addresses across the whole memory system. It is therefore submitted that claims 4, 10 and 16 are patentably distinguishable over the prior art and allowance of these claims is requested.

Claims 6, 12 and 18 are rejected under 35 U.S.C. 103(a) as being unpatentable over the Applicant Admitted Prior Art (AAPA) in view of Oguchi and further in view of U.S. Okumura, and further in view of Fling, and further in view of U.S. Patent No. 5,488,587 to Fukumoto ("Fukumoto").

Claims 6, 12 and 18 depend respectively from claims 1, 7 and 13. As discussed above, the first combination of AAPA, Oguchi and Okumura does not teach all of the limitations of the prior art and the additions of Fling and Fukumoto do not cure this deficiency. Neither of the references added to the combination teach sector addresses across the whole memory system. It is therefore submitted that claims 6, 12 and 18 are patentably distinguishable over the prior art and allowance of these claims is requested.

Claim 19 has been similarly amended as claim 1, as discussed above. It is therefore submitted that claim 19 and its dependents claims 20-21 are patentably distinguishable over the prior art and allowance of these claims is requested.

## Conclusion

For the foregoing reasons, reconsideration and allowance of claims 1-21 of the application as amended is requested. The Examiner is encouraged to telephone the undersigned at (503) 222-3613 if it appears that an interview would be helpful in advancing the case.

Respectfully submitted, MARGER JOHNSON & McCOLLOM, P.C.

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